

MEMO ENDORSED

ROBERT WISNIEWSKI P.C.
ATTORNEYS-AT-LAW

17 STATE STREET, SUITE 820 • NEW YORK, NY 10004
TEL: (212) 267-2101 • WEBSITE: www.rwapc.com

September 30, 2021

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007
VIA ECF

The application is granted
 denied



Edgardo Ramos, U.S.D.J.
Dated: September 30, 2021
New York, New York 10007

Re: Animucka v. Singer et al
Docket No.: 1:20-cv-07867 (ER)

Dear Judge Ramos,

This office represents Plaintiff Stanislawa Animucka in this action. I write to respectfully request a further one-week extension of time until October 8, 2021 to file Plaintiff's motion for default judgment (the "Motion"). This is the second request of this kind. Your Honor previously agreed to the first extension in an Order, dated September 7, 2021 (Doc. No. 24), which set the current deadline to file the Motion by October 1, 2021. No party is prejudiced by this request inasmuch as Defendants have defaulted in this action.

Plaintiff's counsel needs additional time to finalize his motion papers due to a backlog of work, which resulted from his absence in early September. Plaintiff's counsel travelled to Poland in connection with an urgent estate matter arising from his mother's passing. Our office has been working diligently to assemble all supporting documentation and affidavits to Plaintiff's Motion and we are confident that no additional extensions of time will be needed.

Wherefore, Plaintiff respectfully requests permission to file her Motion on or before October 1, 2021.

Respectfully submitted,

/s/ Barbara Luberadzka
Barbara Luberadzka

Associate